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REMARKS

The Office Action dated January 31, 2006 has been received and considered. Reconsideration of the outstanding rejection in the present application is respectfully requested based on the following remarks.

Rejection of claims 1, 17, 31, 40 and 47

At page 3 of the Office Action, claims 1, 17, 31, 40 and 47 are rejected under 35 U.S.C. § 112, 2nd paragraph. This rejection is respectfully traversed.

Claims 1, 17, 31, 40, and 47 each recite "a first encrypted routine of a software driver." According to the Office Action, this term is allegedly ambiguous because "different interpretations can be made as either a) software driver routines...can be encrypted, or b) the routines of crypto-functions to encrypt/decrypt the software drivers data can be encrypted." *Office Action*, p. 2. Applicant respectfully disagrees that there is ambiguity in the term "a first encrypted routine of a software driver." One skilled in the art would understand that a software driver can include one or more routines, and that one or more of these routines can be encrypted. One skilled in the art would also understand that one of the routines of the software driver can be an encryption routine, and that the encryption routine itself could be encrypted. The term *encryption* refers to the function of the routine, while the term *encrypted* refers to a state of the routine itself. Accordingly, the fact that one of the software driver routines may be an encrypted *encryption* routine does not render the term "a first *encrypted* routine of a software driver" ambiguous.

In view of the foregoing, it is respectfully submitted that the Section 112, 2nd paragraph rejection is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Anticipation Rejection of Claims 1, 9, 10, 12, 31, 32, 47, 49, 52, and 54

At page 5 of the Office Action, claims 1, 9, 10, 12, 31, 32, 47, 49, 52, and 54 are rejected under 35 U.S.C. § 102(e) as being anticipated by Glover (U.S. 6,868,495). This rejection is respectfully traversed.

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Claim 1 recites “decrypting, at the peripheral device, the first encrypted routine to generate a plaintext routine.” This feature is not disclosed by Glover. The Office Action states that “the device driver [of Glover] decrypts the encrypted code...and accordingly the encrypted code is decrypted at a peripheral device to meet the claim language.” *Office Action*, p. 3. However, the Office Action fails to cite any portion of Glover that states decryption is performed at a peripheral device. In fact, Glover explicitly states that decryption takes place *at the device driver*:

The file system driver 124 returns encrypted code 138 to the device driver 122. The encrypted code 138 actually passes back through the device driver 122 to the operating system 120 which in turn provides the encrypted code 138 to the device driver 122 as the reply to the request 136 for the original file. *The device driver 122 then decrypts the code* to provide decrypted code 140 to the operating system 120.

Glover, col. 11, lines 13-19 (emphasis added). One of skill in the art will appreciate that a device driver is used to interface with a peripheral device, and is not located at the peripheral device itself. Accordingly, Glover is explicit that decryption takes place *at the device driver*, rather than *at a peripheral device*, as recited by claim 1. Further, Glover does not disclose decrypting an encrypted routine to generate a plaintext routine, as recited by claim 1. Accordingly, Glover fails to disclose each and every element of claim 1.

Claims 9, 10 and 12 depend from claim 1. Accordingly, Glover fails to disclose each and every element of these claims, at least by virtue of their dependence on claim 1. In addition, these claims recite additional non-obvious elements.

With respect to claim 31, the claim recites “a peripheral device, said peripheral device to decrypt a first encrypted routine and generate a plaintext routine.” This element is not disclosed or suggested by Glover. As explained above, Glover discloses that the device driver 122 performs decryption functions, rather than a peripheral device. Glover does not disclose a peripheral device to decrypt a first encrypted routine and generate a plaintext routine. Accordingly, Glover fails to disclose or suggest each and every element of claim 31.

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Claim 32 depends from claim 31. Accordingly, Glover fails to disclose each and every element of this claim, at least by virtue of their dependence on claim 31. In addition, this claim recites additional non-obvious elements.

With respect to claim 47, the claim recites "sending a first encrypted routine of a first software driver to a peripheral device" and "decrypting, at the peripheral device, the first encrypted routine to generate a plaintext routine." As explained above, Glover does not disclose or suggest these elements.

With respect to claim 49, the claim recites "sending a first encrypted data associated with an application to a peripheral device, wherein the application is to interface with the peripheral device" and "decrypting, at the peripheral device, the first encrypted data to generate a plaintext data." Glover does not disclose or suggest that a peripheral device performs a decryption function. Glover therefore fails to disclose or suggest sending encrypted data associated with an application to a peripheral device and decrypting the data at the peripheral device. Accordingly, Glover fails to disclose or suggest each and every element of claim 49.

Claims 52 and 54 depend from claim 49. Accordingly, Glover fails to disclose each and every element of these claims, at least by virtue of their dependence on claim 49. In addition, these claims recite additional non-obvious elements.

In view of the forgoing, it is respectfully submitted that the rejection of claims 1, 9, 10, 12, 31, 32, 47, 49, 52 and 54 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Obviousness Rejection of Claims 2- 8, 11, 13, 14-27, 33-46, 50, 51, and 53

At page 9 of the Office Action, claims 2, 3, 8, 11, 13, 16, 33, 38, 39, 50, and 51 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Glover (U.S. 6,868,495) in view of Candelore (U.S. 2002/0073315). This rejection is respectfully traversed.

Claims 2, 3, 8, 11, 13 and 16 depend from claim 1. Claims 33, 38, and 39 depend from claim 31. Claims 50 and 51 depend from claim 49. As explained above, Glover fails to disclose each and every element of claims 1, 31 and 49. In addition, Candelore does not remedy the

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deficiencies of Glover. Accordingly, Glover and Candelore, individually and in combination, do not disclose or suggest each and every element of claims 2, 3, 8, 11, 13 16, 33, 38, 39, 50 and 51 at least by virtue of their respective dependence on claims 1, 31 and 49. In addition, these claims recite additional non-obvious elements.

At page 10 of the Office Action, claims 4-7 and 53 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Glover (U.S. 6,868,495) in view of Freeman (U.S. 2002/0129374). This rejection is respectfully traversed.

Claims 4-7 depend from claim 1. Claim 53 depends from claim 49. As explained above, Glover fails to disclose each and every element of claims 1 and 49. In addition, Freeman does not remedy the deficiencies of Glover. Accordingly, Glover and Freeman, individually and in combination, do not disclose or suggest each and every element of claims 4-7 and 53 at least by virtue of their respective dependence on claims 1 and 49. In addition, these claims recite additional non-obvious elements.

At page 12 of the Office Action, claims 14 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Glover (U.S. 6,868,495) in view of Wilson (U.S. 4,520,232). This rejection is respectfully traversed.

Claims 14 and 15 depend from claim 1. As explained above, Glover fails to disclose each and every element of claim 1. In addition, Wilson does not remedy the deficiencies of Glover. Accordingly, Glover and Wilson, individually and in combination, do not disclose or suggest each and every element of claims 14 and 15 at least by virtue of their dependence on claim 1. In addition, these claims recite additional non-obvious elements.

At page 12 of the Office Action, claims 17-27, 30, and 40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Glover (U.S. 6,868,495) in view of Freeman (U.S. 2002/0129374), and in further view of Candelore (U.S. 2002/0073315). This rejection is respectfully traversed.

Claim 17 recites "sending a first encrypted routine of a software driver to a graphics chip, wherein the software driver is to interface with the graphics chip, and where the first encrypted

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routine is an encrypted version of an encryption routine” and “decrypting, at the graphics chip, the first encrypted routine to generate a plaintext routine, wherein the plaintext routine is a version of the encryption routine.” As explained above, Glover does not disclose sending an encrypted routine of a software driver to a graphics chip, and further does not disclose decrypting the encrypted routine at the graphics chip. In addition, Freeman and Candelore do not remedy the deficiencies of Glover. Accordingly, Glover, Freeman and Candelore, individually and in combination, fail to disclose or suggest each and every element of claim 17.

Claim 40 recites “a first interface to receive a first encrypted routine of a software driver” and “a first hardware component to decrypt the first encrypted routine.” As explained above, Glover does not disclose a system with a first interface to receive and encrypted routine of a software driver, and further does not disclose a hardware component to decrypt the encrypted routine at the graphics chip. In addition, Freeman and Candelore do not remedy the deficiencies of Glover. Accordingly, Glover, Freeman and Candelore, individually and in combination, fail to disclose or suggest each and every element of claim 40.

Claim 18-27 and 30 depend from claim 17. Claims 34-37 depend from claim 31. Claims 41-46 depend from claim 40. Accordingly, Glover, Freeman and Candelore, individually and in combination, do not disclose or suggest each and every element of claims 18-27, 30, 34-37 and 41-46 at least by virtue of their respective dependence on claims 17, 31 and 40. In addition, these claims recite additional non-obvious elements.

At page 18 of the Office Action, claims 34-37 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Glover (U.S. 6,868,495) in view Candelore (U.S. 2002/0073315), and in further view of Freeman (U.S. 2002/0129374). This rejection is respectfully traversed.

At page 19 of the Office Action, claims 28 and 29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Glover (U.S. 6,868,495) in view of Freeman (U.S. 2002/0129374), in further view of Candelore (U.S. 2002/0073315), and in view of Wilson (U.S. 4,520,232). This rejection is respectfully traversed.

Claims 28 and 29 depend from claim 17. As explained above, Glover, Freeman and Candelore fail to disclose each and every element of claim 17. Further, Wilson does not remedy the deficiencies of the other references. Accordingly, Glover, Freeman and Candelore,

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individually and in combination, do not disclose or suggest each and every element of claims 28 and 29 at least by virtue of their respective dependence on claim 17.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 2- 8, 11, 13, 14-27, 33-46, 50, 51, and 53 is improper. Reconsideration of the claims and withdrawal of this rejection therefore is respectfully requested.

Conclusion

The Applicants respectfully submit that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

The Commissioner is hereby authorized to charge any fees that may be required, or credit any overpayment, to Deposit Account Number 50-0441.

Respectfully submitted,

Date

3/29/06



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